

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

JOANN, INC., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 25-10068 (CTG)

(Jointly Administered)

**NOTICE OF APPEARANCE AND  
REQUEST FOR SERVICE OF NOTICES AND PAPERS**

**PLEASE TAKE NOTICE** that Chaffetz Lindsey LLP and Morris, Nichols, Arsht & Tunnell LLP hereby enter their appearance (the “Notice of Appearance”) in the above-captioned cases as counsel to CRAFTY (AL) LLC (“Crafty”) pursuant to section 1109(b) of title 11 of the United States Code, rules 2002, 3017(a), 9007, and 9010 of the Federal Rules of Bankruptcy Procedure (as amended, the “Bankruptcy Rules”), and rule 2002-1(d) of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware, and request that copies of any and all notices and papers filed or entered in these cases be given to and served upon the following:

**CHAFFETZ LINDSEY LLP**

Alan J. Lipkin  
1700 Broadway, 33rd Floor  
New York, NY 10019  
Telephone: (212) 257-6922  
Facsimile: (212) 257-6950  
alan.lipkin@chaffetzlindsey.com

**MORRIS, NICHOLS, ARSHT &  
TUNNELL LLP**

Curtis S. Miller  
Austin T. Park  
1201 N. Market St., Suite 1600  
P.O. Box 1347  
Wilmington, DE 19899-1347  
Telephone: (302) 658-9200  
Facsimile: (302) 658-3989  
cmiller@morrisnichols.com  
apark@morrisnichols.com

<sup>1</sup> The Debtors in these chapter 11 cases, together with the last four digits of each Debtor’s federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors’ mailing address is 5555 Darrow Road, Hudson, OH 44236.

**PLEASE TAKE FURTHER NOTICE** that this constitutes not only a request for service of the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, a request for service of all orders and notices of any application, motion, petition, pleading, request, complaint, or demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, courier service, hand delivery, telephone, facsimile transmission, telegraph, telex, or otherwise, that: (1) affects or seeks to affect in any way any rights or interests of any creditor or party in interest in these cases, with respect to: (a) the debtors in the above-captioned cases (the “Debtors”) and any related adversary proceedings, whether currently pending or later commenced; (b) property of the Debtors’ estates, or proceeds thereof, in which the Debtors may claim an interest; or (c) property or proceeds thereof in the possession, custody, or control of others that the Debtors may seek to use; or (2) requires or seeks to require any act or other conduct by a party in interest.

**PLEASE TAKE FURTHER NOTICE** that this notice of appearance and any subsequent appearance, pleading, claim, or suit is not intended nor shall be deemed to waive the rights of Crafty: (1) to have an Article III judge adjudicate in the first instance any case, proceeding, matter, or controversy as to which a bankruptcy judge may not enter a final order or judgment consistent with Article III of the United States Constitution; (2) to have final orders in a non-core case, proceeding, matter, or controversy entered only after an opportunity to object to proposed findings of fact and conclusions of law and a *de novo* review by a district court judge; (3) to trial by jury in any case, proceeding, matter, or controversy so triable; (4) to have the reference withdrawn by the United States District Court in any case, proceeding, matter, or controversy subject to mandatory or discretionary withdrawal; or (5) any other rights, claims, actions, defenses, setoffs, or recoupments to which Crafty is or may be entitled under agreements, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments expressly are hereby reserved.

For the avoidance of doubt, filing this notice is not intended as, and shall not be, Crafty's consent to the entry of final orders and judgments in any case, proceeding, matter, or controversy if it is determined that the Court, consistent with Article III of the United States Constitution does not have such authority.

Dated: January 23, 2025  
Wilmington, Delaware

**MORRIS NICHOLS ARSHT & TUNNELL LLP**

/s/ Curtis S. Miller  
Curtis S. Miller (No. 4583)  
Austin T. Park (No. 7247)  
1201 North Market Street, Suite 1600  
P.O. Box 1347  
Wilmington, DE 19899-1347  
Telephone: (302) 658-9200  
Facsimile: (302) 658-3989  
cmiller@morrisnichols.com  
apark@morrisnichols.com

- and -

**CHAFFETZ LINDSEY LLP**

Alan J. Lipkin  
1700 Broadway, 33rd Floor  
New York, NY 10019  
Telephone: (212) 257-6960  
Facsimile: (212) 257-6950  
alan.lipkin@chaffetzlindsey.com

*Counsel to CRAFTY (AL) LLC*